REMARKS/ARGUMENTS

Favorable reconsideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 1-91 are currently pending in the application, Claims 1-8, 22-26, 43-48, 64-68 and 85-90 having been withdrawn. Claims 9, 11, 14, 16, 17, 19, 27, 29, 32-34, 38, 40, 49, 51, 55, 57, 60, 62, 69, 71, 74, 76, 80 and 82 are amended by the present amendment. Support for the amended claims can be found in the original specification, claims and drawings.[1] No new matter is presented.

In the outstanding Office Action, Claim 62 is rejected because of a minor informality; Claim 33 was rejected under 35 U.S.C. § 112, second paragraph; Claims 9, 10, 17, 18, 27, 28, 32, 33, 49, 50, 55, 56, 69, 70, 74 and 75 were rejected under 35 U.S.C. § 102(b) as anticipated by Chen et al. (U.S. Patent No. 6,182,220, hereinafter, Chen); Claims 11, 19, 29, 34, 51, 57, 71 and 76 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen in view of "an obvious duplication of parts"; Claims 14, 15, 38, 39, 58, 60, 61, 62, 78, 80, 81, 82, 16, 36, 35, 40 and 62 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen in view of Box et al. (Simple Object Axis Protocol (SOAP) 1.1 p.5, hereinafter Box); Claims 13, 21, 31, 59, 37, 54, 73 and 79 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen in view of Aman et al. (U.S. Patent No. 6,249,800, hereinafter Aman) and Gase (U.S. Patent No. 6,184,996); Claims 35, 52 and 57 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen in view of Narin (U.S. Publication 2002/0091755); Claims 41 and 83 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen and Box in view of Narin; in Claims 42, 63, 84 and 90-91 were rejected under 35 U.S.C. § 103(a) as unpatentable over Chen and Box, in view of Aman and Gase.

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[1] E.g., specification, Figs. 8-10 and 22-24 and their corresponding description in the specification.

Regarding the objection to Claim 62, this claim is amended to correct the minor informality noted in the outstanding Office Action. Accordingly, Applicant respectfully requests that the objection to Claim 62 be withdrawn.

Claim 33 was rejected under 35 U.S.C. § 112, second paragraph, as indefinite. Specifically, the outstanding Office Action cites the phrase "the client operation response and the client operation response" as redundant. In response, Claim 33 is amended to recite "the client operation response and the server operation response". Accordingly, Applicant respectfully requests that the rejection of Claim 33 under 35 U.S.C. § 112, second paragraph, be withdrawn.

In response to the above-noted rejections under 35 U.S.C. § 102 and 35 U.S.C. § 103, Applicant respectfully submits that the pending amended independent claims recite novel features clearly not taught nor rendered obvious by the applied references.

Amended independent Claim 9 is directed to a communication apparatus configured to communicate with another communication apparatus as a communication counterpart. The communication apparatus includes a transmitter for collectively transmitting, to the communication counterpart, a first operation request to be transmitted to the communication counterpart and a second operation response to a second operation request from the communication counterpart, wherein the first operation request and the second operation response are combined in one batch. The apparatus also includes a receiver configured to receive, from the communication counterpart, a first operation response to the first operation request transmitted to the communication counterpart and the second operation request from the communication counterpart, wherein the first operation response and the second operation request are combined in one batch. The apparatus also includes a processor for executing an operation according to the second operation request from the communication counterpart, and generating the second operation response to the second operation request as an execution

result of the operation. Independent Claim 9 is amended to further recite that the

communication apparatus comprises:

> ...a memory configured to store data *indicating a status of each of the operation requests transmitted and received between the communication apparatus and the communication counterpart*.

Independent Claims 11, 14, 16, 17, 19, 27, 29, 32, 34, 38, 40, 49, 51, 55, 57, 60, 62,

69, 71, 74, 76, 80 and 82, while directed to alternative embodiments are amended to recite

substantially similar features. Accordingly, the remarks presented below are applicable to

each of the above-noted independent claims.

As described in the exemplary embodiment at Figs. 8-10 and pp. 47-49, the client

device includes both a client command pool and a server command pool which include both

client command sheets and server command sheets that reflect various information (including

a status) concerning operation requests transmitted between the two devices. The pending

independent claims are amended to specifically indicate that these command sheets include a

"status" indicator that indicates the progress of the operation request to which the command

sheet corresponds. This information is used to manage the flow of operation requests and

operation responses transmitted between the communication apparatus and the

communication counterpart. As disclosed at Figs. 22-24 and the corresponding description,

the server device in the present invention includes a similar configuration.

Turning to the applied references, <u>Chen</u> is directed to a method and system for

communicating encrypted user passwords from a client to a server. At col. 3, lines 8-11 <u>Chen</u>

describes that "it is permissible and common practice to bundle more than one response or

request, or to combine a request with a response,..." Thus, <u>Chen</u> describes a process for

communicating encrypted user passwords from a client to a server and that the response or

request exchanged between the client server may be bundled.

Chen, however, fails to teach or suggest that either the client or the server include "a memory configured to store *data indicating a status of each of the operation requests transmitted and received between the communication apparatus and the communication counterpart*," as recited in amended independent Claim 9.

Specifically, Chen, as depicted in Figs. 2-4 merely describes an exchange of parameters between a client and a server, and fails to teach or suggest the use of a memory (e.g., client or server command pool) or a command sheet associated with each operation request to manage the exchange of requests and responses between the client and server. Moreover, Chen also fails to teach or suggest the use of any mechanism that indicates the status of requests sent from and received at either the client device or the server device.

Thus, Chen fails to teach or suggest that his client or server includes "a memory configured to *store data indicating a status of each of the operation requests transmitted and received between the communication apparatus and the communication counterpart*," as recited in amended independent Claim 1.

Box is relied upon only to describe the concept of using SOAP in requests and responses, and also fails to teach or suggest the above-noted step recited in amended independent Claim 1.

Gase describes a method which enables remote control of a print queue and network printer which receives print jobs over the Internet from plural client processors.[2] As noted in the outstanding Office Action, col. 2, lines 41-42 of Gase describes a process in establishing priorities of responses.

Gase, however, fails to teach or suggest that either the printer or the client includes a memory configured to store data indicating a status of *each of the operation requests transmitted and received* between the printer and the client. Specifically, Gase may describe

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[2] Gase, Abstract.

a process of maintaining a print queue and the status of operation requests received from the

client processor, but fails to teach or suggest also storing data indicating a status of an

operation request transmitted *from* the printer.

Aman describes an apparatus for use in a multi-system shared data environment for

dynamically assigning and balancing new work and for new session requests, in view of

attendant user-defined business importance of these requests.[3] As noted in the outstanding

Office Action, col. 2, lines 63-66 of Aman describes how an individual server receives

requests and assigns a priority for each of these requests.

However, similar to Gase, Aman fails to teach or suggest that the clients or servers in

his system are capable of storing data indicating a status of each of the operation requests

transmitted and received between each of the servers or between the servers and a client, as

recited in amended independent Claim 1.

Narin describes a process of generating and/or servicing requests for information

requested across networks.[4] As noted in the outstanding Office Action, paragraph [0067] of

Narin describes that a web browser (502) of a client device may be configured to periodically

transmit a new HTTP request to the server (508) to refresh a web page already being viewed.

Narin, however, does not describe that his system includes a mechanism indicating

the status of ***operation requests transmitted and received*** between the client and server

devices, as recited in the pending independent claims.

Therefore, Chen, Box, Aman, Gase and Narin neither alone, nor in combination, teach

or suggest a communication apparatus including "a memory configured to store data

indicating a status of each of the operation requests ***transmitted and received between the***

communication apparatus and communication counterpart," as recited in amended

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[3] Aman, Abstract.
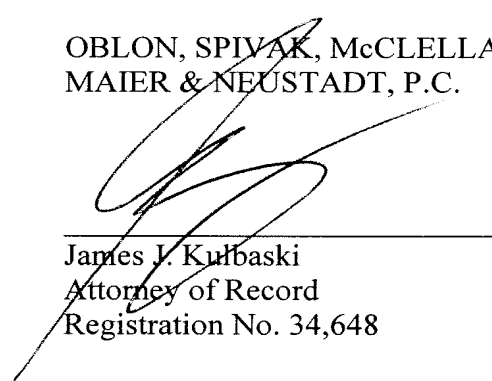[4] Narin, Abstract.

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independent Claim 1. Further, as noted above, independent Claims 11, 14, 16, 17, 19, 27, 29, 32, 34, 38, 40, 49, 51, 55, 57, 60, 62, 69, 71, 74, 76, 80 and 82 are amended to recite substantially similar features as those recited in amended independent Claim 1 and are believed to be patentable over the applied references for at least the reasons discussed above.

Accordingly, Applicant respectfully requests that the rejection of Claims 9-21, 27-42, 49-63, 69-84 and 91 under 35 U.S.C. § 103 be withdrawn.

Consequently, in view of the present amendment and in light of the foregoing comments, it is respectfully submitted that the invention defined by Claims 1-91 is patentably distinguishing over the applied references. The present application is therefore believed to be in condition for formal allowance and an early and favorable reconsideration of the application is therefore requested.

Respectfully submitted,

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